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[Additional Counsel Appear On Signature Page]

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF WASHINGTON

ROBERT and DANELLE BLANGERES,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

UNITED STATES SEAMLESS, INC.,
and KAYCAN LIMITED,

Defendants.

NO. 2:13-cv-00260-LRS

**MOTION FOR ADMISSION
*PRO HAC VICE***

Jill Lin (the “Applicant”) hereby moves the Court to enter an order
permitting her to participate in this case *Pro Hac Vice* as counsel for Plaintiffs
Robert and Danelle Blangeres (“Plaintiffs”), pursuant to Local Rule 83.2(c). In
support of this Motion, the Applicant states as follows:

1 1. The Applicant is an associate in the law firm of Audet & Partners,
2 LLP, in San Francisco, California.

3 2. The Applicant is a member in good standing of the bars several
4 Federal District Courts and the highest courts in California.

5 3. The Applicant does not reside in the State of Washington and does
6 not maintain an office in the State of Washington.

7 4. The Applicant responds to the information requested in Local Rule
8 83.2(c)(2) as follows:

9 (a) The Applicant's address and telephone number are 221 Main
10 Street, Suite 1460, San Francisco, California, 94105; telephone (415) 568-2555;
11 facsimile (415) 568-2556; email: jlin@audetlaw.com.

12 (b) The dates of admission to practice before other courts are
13 listed below:

<u>State Bar Admissions</u>	<u>Date Admitted</u>
California	12/03/2012

<u>Federal Bar Admissions</u>	<u>Date Admitted</u>
N.D. California	12/12/2012
C.D. California	12/07/2012

17 (c) The name, address and telephone number of admitted counsel
18 with whom the Applicant will be associated are: Beth E. Terrell and Erika L.
19 Nusser of Terrell Marshall Daudt & Willie PLLC, 936 North 34th Street, Suite
20 300, Seattle, Washington, 98103-8869; telephone (206) 816-6603; facsimile (206)
21 350-3528; email: bterrell@tmdwlaw.com, enusser@tmdwlaw.com.

22 (d) The Applicant's appearance is necessary because Plaintiffs in
23 this action have retained him in this action.

1 (e) There are no disciplinary sanction actions pending against the
2 Applicant and the Applicant has never been subject to any disciplinary sanctions
3 by any court or Bar Association.

4 5. The Applicant understands that if she is admitted *Pro Hac Vice* she
5 will be subject to the disciplinary jurisdiction of this Court.

6 6. The Applicant is familiar with the facts, issues and documents
7 associated with this case.

8 7. The Applicant is familiar with the local rules of this Court.

9 WHEREFORE, Jill Lin respectfully requests that the Court enter an order
10 in the form proposed granting the admission *Pro Hac Vice* of Jill Lin during the
11 pendency of this case.

12 I declare under penalty of perjury under the laws of the United States of
13 America that the foregoing is true and correct.

14
15 Dated: 3/25/2014



Jill Lin, Applicant

1 **STATEMENT OF LOCAL COUNSEL**

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3 I, Beth E. Terrell, states that Erika L. Nusser and I are co-counsel for
4 Plaintiffs in this matter. We will participate in a meaningful manner in
5 preparation and trial of this case and we are authorized and will be prepared to
6 handle this matter, including trial, in the event that the applicant Jill Lin is unable
7 to be present upon any date assigned by the Court.

8 **RESPECTFULLY SUBMITTED AND DATED** this 25th day of March,
9 2014.

10 **TERRELL MARSHALL DAUDT**
11 **& WILLIE PLLC**

12
13 By: /s/ Beth E. Terrell, WSBA #26759
14 Beth E. Terrell, WSBA #26759
15 Erika L. Nusser, WSBA #40854
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CERTIFICATE OF SERVICE

I, Beth E. Terrell, hereby certify that on March 25, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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Email: mmunson@tcplaw.com

1 DATED this 25th day of March, 2014.

2
3 TERRELL MARSHALL DAUDT
4 & WILLIE PLLC

5 By: /s/ Beth E. Terrell, WSBA #26759

6 Beth E. Terrell, WSBA #26759

7 Attorneys for the Plaintiff

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14 *Attorneys for Plaintiff*
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